## KOBRE & KIM

800 THIRD AVENUE NEW YORK, NEW YORK 10022 WWW.KOBREKIM.COM TEL +1 212 488 1200

September 8, 2023

## **BY EMAIL**

The Hon. Valerie F. Figueredo United States District Judge Southern District of New York 500 Pearl St. New York, NY 10007 Application Granted

Valerie Figueredo, U.S.M.J.

DATED: September 8, 2023

Re: United States v. Olivier Amar, S1 23 Cr. 251 (AKH)

Dear Judge Figueredo:

We write on behalf of our client, Olivier Amar, to request a modification to his current bail conditions. Specifically, we request that the bail condition imposing a curfew be removed and that he continue to be subject to 24-hour location-monitoring. We have conferred with Pretrial Services and the Government, who have no objection to the requested modification.

By way of background, Mr. Amar surrendered and was presented on Indictment S1 23 Cr. 251 on July 13, 2023. He was released on his own signature later that day. He has been subject to GPS location-monitoring as well as a curfew since his release. Pretrial Services confirms that he has been fully compliant with all conditions of his bond. As noted, if the Court grants the requested relief, Mr. Amar will continue to be subject to location monitoring.

We appreciate the Court's consideration of this request. As always, the undersigned counsel are available to answer any questions the Court may have.

Respectfully submitted,

/s/ Sean S. Buckley
Steven G. Kobre
Sean S. Buckley

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> 800 Third Avenue New York, NY 10022 Telephone: (212) 380-1253 Facsimile: (212) 488-1220 Steven.Kobre@kobrekim.com Sean.Buckley@kobrekim.com

Counsel for Defendant Olivier Amar

cc: AUSAs Dina McLeod and Micah Fergenson Attorneys for the Government